



Public Health Environmental Health Services

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August 10, 2017

Public Water System No. 3601124

NRG Etiwanda Generating Station
8996 Etiwanda Ave.
Etiwanda, CA 91739

CITATION NO. 05_66_17C_032_3601124_52
LEAD ACTION LEVEL (AL) EXCEEDANCE

Enclosed is Compliance Order Citation No. 05_66_17C_032_3601124_52 issued to the NRG Etiwanda Generating Station public water system.

Any future enforcement actions taken by the Division of Environmental Health Service (Division) regarding this citation will be billed at the Division's current hourly rate of \$244.80. Future enforcement actions may include any time spent by the Division due to NRG Etiwanda Generating Station failure to meet any directives as stated on Citation No. 05_66_17C_032_3601124_52.

Any person or entity who is aggrieved by a citation, order or decision issued by the Division of Environmental Health Services (DEHS) under Article 8 (commencing with Health and Safety Code, Section 116625), of the Safe Drinking Water Act (Chapter 4, Part 12, Division 104, of the Health and Safety Code) may file a petition with the State Water Board for reconsideration of the citation, order, or decision. Appendix 1 to the enclosed citation contains the relevant statutory provisions for filing a petition for reconsideration (Health and Safety Code, Section 116701).

Petitions must be received by the State Board within 30 days of the issuance of the citation, order or decision by the DEHS. The date of issuance is the date when the DEHS mails a copy of the citation, order or decision. If the 30th day falls on a Saturday, Sunday, or state holiday, the petition is due the following business day. Petitions must be received by 5:00 pm.

Information regarding filing petitions is available at:

http://www.waterboards.ca.gov/drinking_water/programs/petitions/index.shtml

Thank you,

A handwritten signature in black ink, appearing to read "Belinda Huy".

Belinda Huy, EHS
Division of Environmental Health Services
San Bernardino County

Certified Mail No.

cc: Eric Zuniga, District Engineer, SWRCB-DDW by email at
eric.zuniga@waterboards.ca.gov

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**San Bernardino County
Department of Public Health
DIVISION OF ENVIRONMENTAL HEALTH SERVICES**

IN RE: NRG Etiwanda Generating Station
 8996 Etiwanda Ave.
 Etiwanda, CA 91739

ATTN: Public Water System Representative
 8996 Etiwanda Ave.
 Etiwanda, CA 91739

**CITATION NO. 05_66_17C_032_3601124_52
FOR VIOLATION OF HEALTH AND SAFETY CODE SECTION 116555(a)(1)
AND THE PRIMARY DRINKING WATER STANDARD FOR LEAD TITLE 22,
CALIFORNIA CODE OF REGULATIONS, SECTION 64673 (c)**

Issued August 10, 2017

The Division of Environmental Health Services (hereinafter "Division"), hereby issues this compliance order (hereinafter "Order") pursuant to Section 116555 of the California Health and Safety Code (hereinafter "CHSC") to the NRG Etiwanda Generating Station (hereinafter "Water System") public water system and its owner of record for violation of CHSC section 116555(a) (1) and Title 22, California Code of Regulations (hereinafter "CCR"), Section 64673 (c).

APPLICABLE AUTHORITIES

The applicable statutes and regulations are provided in Attachment A, attached hereto and incorporated by reference.

STATEMENT OF FACTS

The Water System is a Public Water System located in San Bernardino County that supplies water to one service connection serving approximately 32 employees. The Water System is permitted as a non-transient non-community water system as defined in CHSC, Section 116275 (k). The Water System utilizes two groundwater wells (East and South Well) as its source of domestic water. Title 22, CCR, Division 4, Chapter 15, Article 4, establishes primary drinking water standards and monitoring and reporting requirements for inorganic constituents, including lead. All public water systems must comply with the action level (AL) for lead of 15 parts per billion (ppb), or 0.015 milligrams per liter (mg/L), as established in Title 22 CCR Section 64678 (d). On 08/26/2015, the concentration of lead in more than 10 percent of the tap water samples collected (the 90th percentile lead level) was established at 20 ppb (see Table 1). Therefore, the Water System exceeds the lead AL of 15 ppb.

Table 1: Lead Analysis Results and 90th Percentile Sampled on 08/26/2015

| Lead Sample Location | Result (ppb) |
|-----------------------------|--------------|
| Unit 3&4 Auxbay Bathroom | Non-detect |
| Unit 3&4 Men's Room Sink | Non-detect |
| Guard House Sink | 11 |
| Admin Break Room | 28 |
| Maint. Lunch Room Sink | Non-detect |
| 90 th Percentile | 20 |

The following is a timeline that represents prior enforcement actions by the Division in efforts to return The Water System into compliance with the CHSC and CCR.

May 4, 2017

A letter was issued to the Water System, which required the Water System to monitor during two consecutive six-month monitoring periods for tap lead and copper and the following water quality parameters (WQP): pH, alkalinity, calcium, conductivity, and water temperature by June 2, 2017. The Water System was also required to distribute a lead public education letter to customers by the 10th day of the following month the samples were taken. Following the issuance of the letter, no action by the Water System was taken regarding the lead AL exceedance. According to the water system's Environmental Compliance Specialist, the letter was sent to a water system representative who is no longer employed with the company and was not received.

DETERMINATIONS

Based on the above Statement of Facts, the Division has determined that the Water System and its owner of record have violated CHSC, Section 116555 and Section 64673 (c) in that following the lead AL exceedance, the Water System failed to monitor for lead, copper, and WQP and implement a lead public education program.

DIRECTIVES

The Water System and its owner of record are hereby directed to take the following actions:

1. By **August 31, 2018**, comply with Title 22, CCR, and Section 64673 (c) and remain in compliance.

2. By **August 31, 2017**, submit a written response to the Division indicating its agreement to comply with the directives of this Citation and with the Corrective Action Plan addressed herein.
3. By **August 31, 2017**, monitor tap lead and copper for the standard monitoring required number of five sites (five samples) during two consecutive six-month monitoring periods. Refer to Attachment No. 1, Title 22, California Code of Regulations, Section 64675, for detailed instructions on lead and copper sampling.
4. By **August 31, 2017**, monitor the following WQPs (one sample representative of water quality throughout the distribution system) for the first period after the exceedance during two consecutive six-month monitoring periods:
 - (a) pH
 - (b) Alkalinity
 - (c) Calcium
 - (d) Conductivity
 - (e) Water temperature
5. Commencing on the date of service of this Citation, by **August 31, 2017**, and by the second six-month monitoring period, provide a lead public education program in accordance with Attachment No. 2, hereto. The lead public education program must include the most recent lead results.
6. Commencing on the date of service of this Citation, within 10 days after the period during which the program was required, using the form provided as Attachment No. 3, hereto, to DEHS demonstrating that the Water System has delivered the public education materials as required in accordance with Attachment No. 2 and include a list of all the newspapers, radio stations, television stations, facilities, and organizations to which the system delivered the materials during the previous year.
7. Notify the Division in writing no later than five (5) days prior to the deadline for performance of any Directive set forth herein if Water System anticipates it will not timely meet such performance deadline.

All submittals required by this Citation shall be electronically submitted to the Division at the following address. The subject line for all electronic submittals corresponding to this citation shall include the following information: NRG Etiwanda Generating Station, 3601124, 05-66-17C-032 and the title of the document being submitted.

Belinda Huy, EHS
Environmental Health Specialist
belinda.huy@dph.sbcounty.gov

As used in this Citation, the date of issuance shall be the date of this Citation; and the Date of service shall be the date of service of this Citation, personal or by certified mail, on the Water System.

The Division reserves the right to make such modifications to this Citation and/or to issue such further order(s) as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Citation and shall be deemed effective upon issuance.

Nothing in this Citation relieves Water System or its owner of record of its obligation to meet the requirements of the California SDWA, or any regulation, standard, permit or order issued thereunder.

PARTIES BOUND

This Citation shall apply to and be binding upon the Water System, its owners, shareholders, officers, directors, agents, employees, contractors, successors, and assignees.

SEVERABILITY

The Directives of this Citation are severable, and Water System and its owner of record shall comply with each and every provision hereof, notwithstanding the effectiveness of any other provision.

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the Division to issue a citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit, standard, citation, or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the Division to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an order of the Division. The Division does not waive any further enforcement action by issuance of this Order.

A handwritten signature in dark ink, appearing to read 'Belinda Huy', with a stylized flourish at the end.

Belinda Huy, EHS
Division of Environmental Health Services
San Bernardino County

Attachments:

Attachment 1: Applicable Authorities

Attachment 2: Lead Public Education Program

Attachment 3: Public Notification Certification of Completion Form

Attachment No. 1

Applicable Statues and Regulations

Applicable Statutes and Regulations
For Citation No. 05_66_17C_032_3601124_52
Violation of Lead AL

CHSC, Section 116555(a)(1) states in relevant part:

- (a) Any person who owns a public water system shall ensure that the system does all of the following:
 - (1) Complies with primary and secondary drinking water standards.

CHSC, Section 116655 states in relevant part:

- (a) Whenever the department determines that any person has violated or is violating this chapter, or any permit, regulation, or standard issued or adopted pursuant to this chapter, the director may issue an order doing any of the following:
 - (1) Directing compliance forthwith.
 - (2) Directing compliance in accordance with a time schedule set by the department.
 - (3) Directing that appropriate preventive action be taken in the case of a threatened violation.
- (b) An order issued pursuant to this section may include, but shall not be limited to , any or all of the following requirements:
 - (1) That the existing plant, works, or system be repaired, altered, or added to.
 - (2) That purification or treatment works be installed.
 - (3) That the source of the water supply be changed.
 - (4) That no additional service connection be made to the system.
 - (5) That the water supply, the plant, or the system be monitored.
 - (6) That a report on the condition and operation of the plant, works, system, or water supply be submitted to the department.

Section 116701 (Petitions to Orders and Decisions) states in relevant parts:

- (a) Within 30 days of issuance of an order or decision issued by the deputy director under Article (commencing with Section 116625) or Article 9 (commencing with Section 116650), an aggrieved person may petition the state board for reconsideration. Where the order or decision of the deputy director is issued after a hearing under Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code, this section shall apply instead of Section 11521 of the Government Code.
- (b) The petition shall include the name and address of the petitioner, a copy of the order or decision for which the petitioner seeks reconsideration, identification of the reason the petitioner alleges the issuance of the order was inappropriate or improper, the specific action the petitioner requests, and other information as the state board may prescribe. The petition shall be accompanied by a statement of points and authorities of the legal issues raised by the petition.
- (c) The evidence before the state board shall consist of the record before the deputy director and any other relevant evidence that, in the judgment of the state board, should be considered to implement the policies of this chapter. The state board may, in its discretion, hold a hearing for receipt of additional evidence.
- (d) The state board may refuse to reconsider the order or decision if the petition fails to raise substantial issues that are appropriate for review, may deny the petition upon a determination that the issuance of the order or decision was appropriate and proper, may set aside or modify the order or decision, or take other appropriate action. The state board's action pursuant to this subdivision shall constitute the state board's completion of its reconsideration.
- (e) The state board, upon notice and hearing, if a hearing is held, may stay in whole or in part the effect of the order or decision of the deputy director.
- (f) If an order of the deputy director is subject to reconsideration under this section, the filing of a petition for reconsideration is an administrative remedy that must be exhausted before filing a petition for writ of mandate under Section 116625 or 116700.

Title 22, California Code of Regulations (CCR), Chapter 17.5, states in relevant part:

Section 64673. Small and Medium-size Water System Requirements, states in relevant part:

- (a) The requirements in this section are applicable to all small and medium-size water systems.
- (b) Each small and medium-size system shall conduct standard tap sampling for lead and copper pursuant to section 64675 (General Requirements for Tap Sampling for Lead and Copper). Tap sampling frequency may be reduced pursuant to section 64675.5 (Tap Sampling Frequency).
- (c) A small or medium-size system with an action level exceedance shall take the following steps:
 - (1) Monitor WQPs beginning with the first period after the exceedance, pursuant to section 64681 (Initial WQP Monitoring).
 - (2) Proceed with subparagraphs (A) through (E) if a corrosion control study is required by the Department based on a review of the system's water quality, distribution system, water treatment, and system features. If such a study is required, the Department will notify the system in writing within 12 months of the action level exceedance.
 - (A) Complete the study, pursuant to section 64683 (Corrosion Control Study Procedure), within eighteen months of being notified of the requirement; the system will be notified of the Department's designation within six months of the study's completion;
 - (B) Begin installation of the CCT designated by the Department, pursuant to section 64684 (CCT Installation and Operation), within twelve months of being notified of the Department's designation;
 - (C) Complete CCT installation and begin operation within 24 months of the designation;
 - (D) Complete two periods of standard tap sampling pursuant to section 64675 (General Requirements for Tap Sampling for Lead and Copper) and two periods of WQP monitoring pursuant to section 64682 (WQP Monitoring After CCT Installation) within 36 months of the designation; and
 - (E) Monitor WQPs and operate in compliance with the WQP levels specified by the Department pursuant to section 64684 (CCT Installation and Operation), beginning no later than within 42 months of the designation.
 - (3) If the Department does not require a corrosion control study, the system shall submit to the Department, within six months of the action level exceedance, a written recommendation for CCT. The Department may require the system to conduct additional WQP monitoring to assist in the review of the CCT recommendation. The Department will designate CCT and notify the system in writing within the following timeframes; the system shall then comply with paragraphs (2)(B) through (E):
 - (A) For medium-size systems, within 12 months of the exceedance, and
 - (B) For small-size systems, within 18 months of the exceedance;
 - (4) Monitor source waters, pursuant to article 6 (Source Water Requirements for Action Level Exceedances) of this chapter;
- (d) A small or medium-size system with an action level exceedance for lead shall:
 - (1) Complete a lead public education program, pursuant to article 7 (Public Education Program for Lead Action Level Exceedances) of this chapter; and
 - (2) Replace lead service lines, pursuant to article 8 (Lead Service Line Requirements for Action Level Exceedances) of this chapter.
- (e) A small or medium-size system that is required to comply with subsections (c) or (d) may cease completing the steps whenever the system does not have an action level exceedance during each of two consecutive periods. If any such system thereafter has an exceedance during any period, the system shall:
 - (1) Resume completion of the applicable steps, beginning with the first step that was not previously completed. The Department may require a system to repeat steps previously completed if the Department determines that this is necessary to implement the requirements of this section, based on a review of the system's data and treatment status.
 - (2) Resume standard tap sampling pursuant to 64675 (General Requirements for Tap Sampling for Lead and Copper).
 - (3) Conduct WQP monitoring during the period in which the system exceeded the action level, pursuant to section 64682, (WQP Monitoring After CCT Installation) or 64684 (CCT Installation and Operation).

Section 64675. General Requirements for Tap Sampling for Lead and Copper, states that:

- (a) During each period, each system shall conduct standard tap sampling by collecting one sample from the number of sites based on the number of people served specified in table 64675-A under Standard Tap Sampling.
- (b) During each period, each system conducting reduced tap sampling shall collect at least one sample from the number of sites based on the number of people served specified in table 64675-A under Reduced Tap Sampling, as follows:
 - (1) The sites shall be representative of the sites required for standard tap sampling.
 - (2) The samples shall be collected during the months of June, July, August, or September, unless the Department approves an alternate set of four months based on a review of the system's operations and lead and copper data, in which case the system shall initiate sampling during the alternate set of four months when directed in writing to do so by the Department, as follows:
 - (A) No later than 21 months after the previous period, if sampling annually, or
 - (B) No later than 45 months after the previous period, if sampling triennially.

**Table 64675-A
Lead and Copper Tap Sampling Sites**

| System Size (Number People Served) | Standard Tap Sampling (Minimum Number of Sites) | Reduced Tap Sampling (Minimum Number of Sites) |
|---------------------------------------|----------------------------------------------------|---------------------------------------------------|
| >100,000 | 100 | 50 |
| 10,001 to 100,000 | 60 | 30 |
| 3,301 to 10,000 | 40 | 20 |
| 501 to 3,300 | 20 | 10 |
| 101 to 500 | 10 | 5 |
| <101 | 5 | 5 |

- (c) Sample sites shall be selected pursuant to section 64676 (Sample Site Selection).

Section 64676. Sample Site Selection, states that:

- (a) Each system shall identify a pool of sampling sites that:
 - (1) Is large enough to ensure that the water system can collect the number of lead and copper tap samples required in section 64675 (General Requirements for Tap Sampling for Lead and Copper);
 - (2) Meets the criteria in subsections (c) or (d), as applicable; and
 - (3) Does not include faucets that have point-of-use or point-of-entry treatment devices designed to remove inorganic contaminants.
- (b) Prior to identifying sampling sites, each system shall conduct an evaluation of its distribution system to determine the construction materials (lead, copper, and galvanized steel) exposed to the water. If necessary to ensure the sample site criteria is met, the system shall collect additional information during the course of its normal operations (e.g., checking service line materials when reading water meters, or performance maintenance activities) and from the following:
 - (1) All plumbing codes, permits, and records in the files of the building department(s) that indicate the plumbing materials installed within publicly and privately owned structures connected to the distribution system;
 - (2) All inspections and records of the distribution system that indicate the material composition of the service connections connecting a structure to the distribution system; and
 - (3) All existing water quality information, which includes the results of prior analyses of the system or individual structures connected to the system, indicating locations that may be particularly susceptible to high lead or copper concentrations.
- (c) Each community water system shall:
 - (1) Identify a sampling pool of "tier 1" sampling sites consisting of single-family structures except that, when multiple-family residences comprise at least 20 percent of the structures served by a water

system, the system may include these types of structures as "tier 1" sites in its sampling pool. The "tier 1" sampling sites shall

- (A) Contain copper pipes with lead solder installed after 1982; or
 - (B) Contain lead pipes; or
 - (C) Be served by a lead service line.
 - (2) If there is an insufficient number of "tier 1" sites, complete its sampling pool with "tier 2" sampling sites, consisting of buildings, including multiple-family residences that:
 - (A) Contain copper pipes with lead solder installed after 1982; or
 - (B) Contain lead pipes; or
 - (C) Are served by a lead service line.
 - (3) If there is an insufficient number of "tier 1" and "tier 2" sampling sites, complete its sampling pool with "tier 3" sampling sites, consisting of single-family structures that contain copper pipes with lead solder installed before 1983. A system with an insufficient number of tier 1, 2 and 3 sites shall complete its sampling pool with representative sites (i.e., plumbing materials commonly found at other sites) throughout the distribution system.
- (d) Each nontransient-noncommunity water system shall:
- (1) Identify a pool of "tier 1" sampling sites consisting of buildings that:
 - (A) Contain copper pipes with lead solder installed after 1982; or
 - (B) Contain lead pipes; or
 - (C) Are served by a lead service line.
 - (2) If there is an insufficient number of "tier 1" sites that meet the criteria in paragraph (1), complete its sampling pool with sites that contain copper pipes with lead solder installed before 1983. If additional sites are needed to complete the sampling pool, the system shall use representative sites (i.e., plumbing materials commonly found at other sites) throughout the distribution system.
- (e) Each system whose distribution system contains lead service lines shall draw 50 percent of the samples it collects during each period from sites that contain lead pipes, or copper pipes with lead solder, and 50 percent of the samples from sites served by a lead service line. A system that cannot identify a sufficient number of sites served by a lead service line shall collect first draw samples from all of the sites identified as being served by such lines.
- (f) A system that does not have enough taps that can provide first-draw samples shall submit written documentation to the Department identifying standing times and locations for enough non-first-draw samples to make up its sampling pool by the start of its next monitoring period.

Section 64677. Sample Collection Methods for Taps, states that:

- (a) All tap samples for lead and copper collected pursuant to this chapter, with the exception of lead service line samples collected under section 64689 (Lead Service Line Sampling) and samples collected under subsection (d), shall be first-draw samples, pursuant to subsection (b).
- (b) A first-draw sample shall be one liter in volume and have stood motionless in the plumbing system of each site for at least six hours, but not more than twelve. Samples from residential housing shall be collected from the cold-water kitchen tap or bathroom sink tap. Samples from a non-residential building shall be collected at an interior tap from which water is typically drawn for consumption. Samples may be collected by the system or the system may allow residents to collect tap samples after instructing the residents of the sampling procedures specified in this section. To avoid problems of residents handling nitric acid, acidification of samples may be done up to 14 days after collection. After acidification to resolubilize the metals, the sample shall stand in the original container for the time specified by the method used pursuant to section 64670(c) before it can be analyzed. If a system allows residents to perform sampling, the system may not challenge, based on alleged errors in sample collection, the accuracy of sampling results.
- (c) A system shall collect each tap sample from the same site from which it collected a sample during the previous period. If the system cannot gain entry to a site in order to collect a tap sample, it may collect the tap sample from another site in its sampling pool as long as the new site meets the same criteria, and is as close as possible to the original site.
- (d) A system that does not have enough taps to supply first-draw samples may apply to the Department in writing to substitute non-first-draw samples. Such systems shall collect as many first-draw samples as possible and identify sampling times and locations that would likely result in the longest standing time for the remaining sites.

Section 64677.5. Sample Invalidation, states that:

- (a) A lead or copper sample may be invalidated by the Department if at least one of the following conditions is met and documented in writing:
 - (1) The laboratory establishes that improper sample analysis caused erroneous results;
 - (2) The Department determines that the sample was taken from a site that did not meet the site selection criteria in section 64676 (Sample Site Selection);
 - (3) The sample container was damaged in transit;
 - (4) The Department determines the sample does not meet the requirements in section 64677(Sample Collection Methods for Taps); or
 - (5) There is substantial reason to believe that the sample was subject to tampering.
- (b) To apply for invalidation of one or more samples, a system shall report the results of all samples for the period to the Department, including written documentation to support the system's belief that one or more samples should be invalidated.
- (c) A sample invalidated pursuant to subsection (a) shall not count toward determining lead or copper 90th percentile levels or toward meeting any monitoring requirements in this chapter.
- (d) The system shall collect replacement samples for any invalidated samples if, after the invalidation of one or more samples, the system has too few samples to meet the monitoring requirements of this chapter. Replacement samples taken after the end of the applicable period shall not be used to meet the monitoring requirements of a subsequent period. Replacement samples shall be collected as follows:
 - (1) As soon as possible, but no later than 20 days after the system receives notification from the Department that it has invalidated the sample, or by the end of the applicable period, whichever occurs later; and
 - (2) At the same locations as the invalidated samples or, if that is not possible, at locations other than those already used for sampling during the monitoring period.

Section 64678. Determination of Exceedances of Lead and Copper Action Levels, states that:

- (a) The detection limits for purposes of reporting (DLRs) for lead and copper are as follows:

Table 64678-A. DLRs for Lead and Copper

| Contaminant | DLR (mg/L) |
|------------------|------------|
| Lead | 0.005 |
| Copper | 0.050 |

- (b) For purposes of determining the difference in concentration between the source water and the 90th percentile tap results, the following shall apply:
 - (1) Analytical results for lead greater than or equal to 0.001 mg/L and less than 0.005 mg/L shall be as measured or 0.0025 mg/L, whichever is greater.
 - (2) Analytical results for copper greater than or equal to 0.001 mg/L and less than 0.050 mg/L shall be as measured or 0.025 mg/L, whichever is greater.
 - (3) Analytical results below 0.001 mg/L for lead and copper shall be considered zero.
- (c) Analytical results below the DLRs for lead and copper specified shall be reported as zero.
- (d) The lead action level is exceeded if the concentration of lead in more than 10 percent of the tap water samples collected during any period is greater than 0.015 mg/L (i.e., if the "90th percentile" lead level is greater than 0.015 mg/L).
- (e) The copper action level is exceeded if the concentration of copper in more than 10 percent of the tap water samples collected during any period is greater than 1.3 mg/L (i.e., if the "90th percentile" copper level is greater than 1.3 mg/L).
- (f) The 90th percentile lead and copper levels shall be computed as follows:
 - (1) The results of all lead or copper samples collected during a period shall be placed in ascending order from the sample with the lowest concentration to the sample with the highest concentration. Each sampling result shall be assigned a number, ascending by single integers beginning with the number 1 for the sample with the lowest contaminant level. The number assigned to the sample with the highest contaminant level shall be equal to the total number of samples taken.
 - (2) The number of samples taken during the period shall be multiplied by 0.9.

- (3) The contaminant concentration in the numbered sample identified by the calculation in paragraph (f)(2) is the 90th percentile contaminant level.
- (4) For water systems serving less than or equal to 100 people that collect 5 samples per period, the 90th percentile is computed by taking the average of the highest and second highest concentrations.
- (g) The results of any monitoring conducted in addition to the minimum requirements of this section shall be considered by the system and submitted to the department for making any determinations.

Section 64679. Supplemental Monitoring, states that:

A water system with a lead action level exceedance shall offer to sample the tap water of any customer who requests it. The system is not required to pay for collecting or analyzing the sample.

Section 64680. General WQP Monitoring Requirements, states that:

- (a) WQP tap monitoring shall be:
 - (1) Representative of water quality throughout the distribution system, by considering the number of persons served, the different sources of water and treatment methods employed, and seasonal variability;
 - (2) Not restricted to sites targeted for lead and copper sampling; and
 - (3) Include two samples for each applicable WQP during each period, from the standard number of sites, based on the number of persons served, specified in table 64680-A.

**Table 64680-A
WQP Tap Monitoring Sites**

| System Size (Number People Served) | Standard Tap Sampling (Minimum Number of Sites) | Reduced Tap Sampling (Minimum Number of Sites) |
|---------------------------------------|----------------------------------------------------|---------------------------------------------------|
| >100,000 | 25 | 10 |
| 10,001 to 100,000 | 10 | 7 |
| 3,301 to 10,000 | 3 | 3 |
| 501 to 3,300 | 2 | 2 |
| 101 to 500 | 1 | 1 |
| <101 | 1 | 1 |

- (b) Initial WQP monitoring at the entry point(s) to the distribution system shall be two samples for each applicable WQP at each entry point from locations representative of each source after treatment. After the installation of CCT, only one sample is required at each entry point. If a system draws water from more than one source and the sources are combined before distribution, the system shall sample at each entry point during normal operating conditions.

Section 64681. Initial WQP Monitoring, states that:

For initial WQP monitoring, each system shall monitor for the following WQPs, pursuant to section 64680 (General WQP Monitoring Requirements):

- (a) pH;
- (b) Alkalinity;
- (c) Orthophosphate, when an inhibitor containing a phosphate compound is used;
- (d) Silica, when an inhibitor containing a silicate compound is used;
- (e) Calcium;
- (f) Conductivity; and
- (g) Water temperature.

Attachment No. 2

Lead Public Education Program



Public Health Environmental Health Services

www.SBCounty.gov

Trudy Raymundo
Director

Corwin Porter, MPH, REHS
Assistant Director

Maxwell Ohikhuare, MD
Health Officer

Josh Dugas, REHS
Division Chief

[Date]

[Public Water System Name]

[Public Water System Address]

SUBJECT: LEAD EXCEEDED ACTION LEVEL

San Bernardino County Environmental Health Services is concerned about lead in your drinking water. The state and federal action level for lead is 15 parts per billion (ppb), or 0.015 milligrams of lead per liter of water (mg/L). The NRG Etiwanda Generating Station public water system had water samples dated 08/26/2015 taken at locations within the distribution system exceeding the action level. Lead was detected at 20 ppb.

HEALTH EFFECTS OF LEAD. Lead is a common metal found throughout the environment in lead-based paint, air, soil, household dust, and food, certain types of pottery porcelain and pewter, and water. Lead can pose a significant risk to your health if too much of it enters your body. Lead builds up in the body over many years and can cause damage to the brain, red blood cells and kidneys. The greatest risk is to young children and pregnant women. Amounts of lead that won't hurt adults can slow down normal mental and physical development of growing bodies. In addition, a child at play often comes into contact with sources of lead contamination -- like dirt and dust -- that rarely affect an adult. It is important to wash children's hands and toys often, and to try to make sure they only put food in their mouths.

LEAD IN DRINKING WATER

1. Lead in drinking water, although rarely the sole cause of lead poisoning, can significantly increase a person's total lead exposure, particularly the exposure of infants who drink baby formulas and concentrated juices that are mixed with water. The U.S. Environmental Protection Agency estimates that drinking water can make up 20 percent or more of a person's total exposure to lead.

2. Lead is unusual among drinking water contaminants in that it seldom occurs naturally in water supplies like rivers and lakes. Lead enters drinking water primarily as a result of the corrosion, or wearing away, of materials containing lead in the water distribution system and household plumbing. These materials include lead-based solder used to join copper pipe, brass and chrome plated brass faucets, and in some cases, pipes made of lead that connect your house to the water main (service lines). In 1986, Congress banned the use of lead solder containing greater than 0.2% lead, and restricted the lead content of faucets, pipes and other plumbing materials to 8.0%. In California, a similar law prohibiting the use of both lead solder and lead pipe was enacted in 1985.

3. When water stands in lead pipes or plumbing systems containing lead for several hours or more, the lead may dissolve into your drinking water. This means the first water drawn from the tap in the morning, or later in the afternoon after returning from work or school, can contain fairly high levels of lead.

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STEPS YOU CAN TAKE IN THE HOME TO REDUCE EXPOSURE TO LEAD IN DRINKING WATER

1. If a water test indicates that the drinking water drawn from a tap in your home contains lead above 15 ppb, then you should take the following precautions:

A. Let the water run from the tap before using it for drinking or cooking any time the water in a faucet has gone unused for more than six hours. The longer water resides in your home's plumbing the more lead it may contain. Flushing the tap means running the cold water faucet until the water gets noticeably colder, usually about 15 to 30 seconds. If your house has a lead service line to the water main, you may have to flush the water for a longer time, perhaps one minute, before drinking. Although toilet flushing or showering flushes water through a portion of your home's plumbing system, you still need to flush the water in each faucet before using it for drinking or cooking. Flushing tap water is a simple and inexpensive measure you can take to protect your family's health.

B. Try not to cook with, or drink water from the hot water tap. Hot water can dissolve more lead more quickly than cold water. If you need hot water, draw water from the cold tap and heat it on the stove.

C. Remove loose lead solder and debris from the plumbing materials installed in newly constructed homes, or homes in which the plumbing has recently been replaced, by removing the faucet strainers from all taps and running the water from 3 to 5 minutes. Thereafter, periodically remove the strainers and flush out any debris that has accumulated over time.

D. If your copper pipes are joined with lead solder that has been installed illegally since it was banned in 1986, notify the plumber who did the work and request that he or she replace the lead solder with lead-free solder. Lead solder looks dull gray, and when scratched with a key looks shiny.

E. Determine whether or not the service line that connects your home or apartment to the water main is made of lead. The best way to determine if your service line is made of lead is by either hiring a licensed plumber to inspect the line or by contacting the plumbing contractor who installed the line. You can identify the plumbing contractor by checking the record of building permits which should be maintained in the files of the [insert name of department that issues building permits]. A licensed plumber can at the same time check to see if your home's plumbing contains lead solder, lead pipes, or pipe fittings that contain lead. The public water system that delivers water to your home should also maintain records of the materials located in the distribution system. If the service line that connects your dwelling to the water main contributes more than 15 ppb to drinking water, after our comprehensive treatment program is in place, we are required to replace the portion of the line we own. If the line is only partially owned by the [insert name of the city, county, or water system that owns the line], we are required to provide the owner of the privately-owned portion of the service line with information on how to replace the privately-owned portion of the service line, and offer to replace that portion of the line at the owner's expense. If we replace only the portion of the line that we own, we also are required to notify you in advance and provide you with information on the steps you can take to minimize exposure to any temporary increase in lead levels that may result from the partial replacement, to take a follow-up sample at our expense from the line within 72 hours after the partial replacement, and to mail or otherwise provide you with the results of that sample within three business days of receiving the results. Acceptable replacement alternatives include copper, stainless steel, and plastic pipes. Partial

replacement should avoid the creation of mixed piping systems and include the installation of approved dielectric couplings at all dissimilar metal interfaces.

F. Have an electrician check your wiring. If grounding wires from the electrical system are attached to your pipes, corrosion may be greater. Check with a licensed electrician or your local electrical code to determine if your wiring can be grounded elsewhere. DO NOT attempt to change the wiring yourself because improper grounding can cause electrical shock and fire hazards.

3. The steps described above will reduce the lead concentrations in your drinking water. However, if a water test indicates that the drinking water coming from your tap contains lead concentrations in excess of 15 ppb after flushing, or after we have completed our actions to minimize lead levels, then you may want to take the following additional measures:

A. Purchase or lease a home treatment device. Home treatment devices are limited in that each unit treats only the water that flows from the faucet to which it is connected, and all of the devices require periodic maintenance and replacement. Devices such as reverse osmosis systems or distillers can effectively remove lead from your drinking water. Since these treatments remove dissolved minerals, water treated by these devices will have a greater tendency to leach lead from brass faucets or fittings which the water contacts after treatment. Some activated carbon filters may reduce lead levels at the tap, however all lead reduction claims should be investigated.

B. Purchase bottled water for drinking and cooking.

4. You can consult a variety of sources for additional information. Your family doctor or pediatrician can perform a blood test for lead and provide you with information about the health effects of lead.

5. The following is a list of some state approved laboratories in your area that you can call to have your water tested for lead.

Clinical Laboratory (909) 825-7693
21881 Barton Rd.
Grand Terrace, CA
92313

Babcock Laboratories (909) 653-3351
6100 Quail Valley Ct.
Riverside, CA 92507

If you have any questions regarding this letter, please call safe drinking water section at 1-800-442-2283.

Attachment No. 3

Public Notice Certification Form

Certification of Completion of Public Notification

*Due to the Division of Drinking Water within 10 days of issuance of notice to water consumers

This form, when completed and emailed to Belinda Huy at belinda.huy@dph.sbcounty.gov, serves as certification that public notification to water users was completed as required by Title 22, California Code of Regulations, Sections 64463-64465.

Public Water System Name: _____

Public Water System No.: _____

☐ The notice was mailed to users on: _____

A copy of the notice is attached.

☐ The notice was hand delivered to water customers on: _____

A copy of the notice is attached.

☐ The notice was published in the local newspaper on: _____

A copy of the newspaper notice is attached.

☐ The notice was published in conspicuous places on: _____

A copy of the notice is attached.

A list of locations the notice was posted is attached.

☐ The notice was delivered to community organizations on: _____

A copy of the notice is attached.

A list of community organizations the notice was delivered to is attached.

I hereby certify that the above information is factual.

Signature

Printed Name/Title

Date

Disclosure: Be advised that Section 116725 and 116730 of the California Health and Safety Code state that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the attached order may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for separate violation each day that the violation continues. In addition, the violators may be prosecuted in criminal court and, upon conviction, be punished by a fine of not more than \$25,000 for each day of violation, or be imprisoned in the county jail not to exceed one year, or by both the fine and imprisonment.

System Number: **3601124**

Citation No. **05_66_17C_032_3601124_52**